

201-15669



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 04 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Gregory G. Bond
Corporate Director of Product Responsibility
The Dow Chemical Company
2030 Dow Center
Midland, MI 48674

Dear Mr. Bond:

Thank you for your letter dated November 30, 1999, to the U.S. Environmental Protection Agency (EPA), regarding the High Production Volume (HPV) Challenge Program. I apologize for the lengthy delay in responding to your request.

Your letter states that you believe sodium sarcosinate (CAS No. 4316-73-8), which is shown on the HPV Chemical List as Glycine, N-methyl- monosodium salt, does not meet the volume requirements to be considered within the HPV Challenge because most of its production is used for Food and Drug Administration (FDA) -regulated uses and that these FDA uses are also included in your reporting to the Inventory Update Rule (IUR). Further, the letter states that this chemical should be exempt from the HPV Challenge because testing using the Screening Information Data Set (SIDS) base set would not further the understanding of the chemical's properties.

Your letter states that The Dow Chemical Company (Dow) and its subsidiary company Hampshire Chemical Corporation produce sodium sarcosinate (CAS No. 4316-73-8) for uses regulated under the FDA, as well as uses regulated under TSCA and that total production volumes have been reported to the IUR. EPA recommends that Dow and Hampshire Chemical Corporation amend their IUR reports to reflect accurate production volumes for the non-FDA uses.

As you may know, EPA posted draft guidance on procedures for removing chemicals that are no longer HPV from the scope of the voluntary HPV Challenge Program on its Chemical Right-to-Know (ChemRTK) website at www.epa.gov/chemrtk in March, 1999. Based on EPA's review of all the pertinent IUR data from 1998 and 2002, EPA has determined that sodium sarcosinate (CAS No. 4316-73-8) **does not meet** the "no longer HPV" criteria.

We will post your letter, accompanied by our reply, on the ChemRTK website as soon as possible. Should you have any questions pertaining to this response, please contact Diane Sheridan at (202) 564-4770. If you have general questions concerning the HPV Challenge Program, please submit them through the ChemRTK website comment button or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached via e-mail at tsc-hotline@epa.gov.

Sincerely,

Wardner G. Penberthy
Acting Director
Chemical Control Division

cc: AR201